

**ATTACHMENT A**  
**Statement of Facts**

*The United States and Defendant Valerie Hughes stipulate and agree that if this case proceeded to trial, the United States would prove the facts set forth below beyond a reasonable doubt. They further stipulate and agree that these are not all of the facts that the United States would prove if this case proceeded to trial but are sufficient to prove the crime of conspiracy to commit bank fraud.*

From in or about February 2017, to March 9, 2017, Defendant Valerie Hughes (“**HUGHES**”), along with co-conspirators Kelvin Asare, Samuel Attakora, Francis Arthur and Gifty Amponsah did knowingly and willfully combine, conspire, confederate, and agree with each other and other individuals to execute a scheme and artifice to defraud financial institutions, and to obtain and attempt to obtain monies, funds, credits, and assets owned by and under the custody and control of the financial institutions, including NYMEO federal credit union, by means of false and fraudulent pretenses, representations and promises (the “scheme to defraud”), in violation of 18 U.S.C. § 1349.

NYMEO Federal Credit Union (“NYMEO”) is a financial institution that provides a wide range of financial services to its members. NYMEO’s members’ deposits are insured by the United States Government via the National Credit Union Insurance Fund (NCUSIF). Defendant **HUGHES** was an assistant manager at the Gaithersburg branch of NYMEO.

On February 24, 2017, an unknown black male entered the Gaithersburg Branch of NYMEO Federal Credit Union located at 1 Bank Street in Gaithersburg, Maryland and presented **HUGHES** with a completed wire transfer form requesting the transfer of \$327,000 from the account of Victim 1 to a Wells Fargo account held in the name of Anivac Inc., The unknown black male also handed **HUGHES** a counterfeit Maryland driver’s license in the name of Victim 1 and bearing the suspect’s picture. The wire transfer form included fields for account number, name and address, which had been completed by the suspect. The wire transfer was initiated and authorized by **HUGHES**. Once the transaction had been completed, the unknown black male also made a cash withdrawal of \$6,000 from the account of Victim 1, which was processed by **HUGHES**. Victim 1 was unaware of either the wire transfer or the withdrawal, and had not authorized either transaction.

On March 9, 2017, the unknown black male returned to the Gaithersburg Branch of NYMEO. The suspect again approached **HUGHES** and represented himself as Victim 1. The suspect presented a counterfeit Maryland identification in the name of Victim 1 and bearing the suspect’s picture. This time, the suspect requested an \$80,000 wire transfer from Victim 1’s account to the account of Anivac Inc. The suspect also requested a \$6,000 withdrawal from Victim 1’s account, which was processed by **HUGHES**. The wire transfer was not authorized because another NYMEO employee recognized that the suspect was not Victim 1.

The fraudulent wire transfer on February 24, 2017, was initiated from the Gaithersburg, Maryland branch of NYMEO Federal Credit Union. The wire was routed through NYMEO’s computer server located in Frederick, Maryland and onto one of three Wells Fargo Bank servers



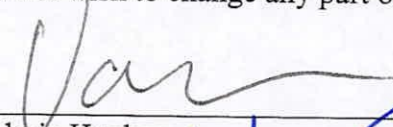
located in Portland, Oregon, Charlotte, North Carolina and Golden, Colorado, and then credited to the account of Anivac, Inc.

**HUGHES** was interviewed by law enforcement and stated that in February of 2017, Attakora and Asare approached her about participating in the fraud scheme. They claimed they had participated in similar fraudulent schemes in the past and had never been caught. They persuaded **HUGHES** to identify "dormant" accounts at NYMEO Federal Credit Union and to provide the account information to them. This information included the name, address, social security number, date of birth, current balance, account number, and phone number associated with the account. Asare and Attakora detailed the plan for **HUGHES** as follows: The plan called for an unknown accomplice to enter the branch and approach **HUGHES**. The suspect was to have a counterfeit identification card in the name of the victim, which he would present to **HUGHES**. **HUGHES** was instructed to process the wire and act as if she knew nothing. In return for her participation, **HUGHES** was to receive \$80,000 of proceeds from the fraudulent wire. **HUGHES** further stated that Asare was responsible for providing the counterfeit identification and coordinating with the unknown accomplice. The money was to be wired to a business account held by an individual known to **HUGHES** as "Francis," later identified as Francis Arthur. **HUGHES** reported that once Francis had received the fraudulent wire he was to transfer a large portion of the proceeds to a female accomplice known to her only as "Sister," later identified as Gifty Amponsah.

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I have read this Statement of Facts and carefully reviewed every part of it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it.

9/6/17  
Date 10/24/17

  
Valerie Hughes

I am Valerie Hughes's attorney. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, her decision to sign it is an informed and voluntary one.

9/6/17  
Date 10/24/17

  
William Simmons, Esq.